



Economic Impact Analysis Virginia Department of Planning and Budget

18 VAC 85-120 – Regulations Governing the Licensure of Athletic Trainers Department of Health Professions August 8, 2005

The Department of Planning and Budget (DPB) has analyzed the economic impact of this proposed regulation in accordance with Section 2.2-4007.H of the Administrative Process Act and Executive Order Number 21 (02). Section 2.2-4007.H requires that such economic impact analyses include, but need not be limited to, the projected number of businesses or other entities to whom the regulation would apply, the identity of any localities and types of businesses or other entities particularly affected, the projected number of persons and employment positions to be affected, the projected costs to affected businesses or entities to implement or comply with the regulation, and the impact on the use and value of private property. The analysis presented below represents DPB's best estimate of these economic impacts.

Summary of the Proposed Regulation

The Board of Medicine (board) proposes to require applicants for athletic trainer licensure hold current National Athletic Trainers' Association Board of Certification (NATABOC) credentials at the time of their initial application.

Estimated Economic Impact

Under current regulations, individuals applying for initial athletic trainer licensure in the Commonwealth must certify that they have:

“... met the educational requirement necessary to hold current credentialing as a Certified Athletic Trainer (ATC) from NATABOC or another credentialing body approved by the board.”

There is no explicit requirement that applicants have current credentials from any approved credentialing body; they need only have the education required to attain credentialing.

Athletic trainers applying for license renewal, however, are unambiguously required to have current NATABOC credentials. This means that under current regulatory requirements individuals who are initially licensed by the Commonwealth may delay getting NATABOC credentials until their biannual license renewal. The board asserts that they did not intend for this discontinuity between requirements for initial licensure and renewal of licensure to exist.

Assuming that individuals who apply to the board for athletic trainer licensure intend to continue practicing their trade in the Commonwealth for more than two years, the added cost associated with the proposed change in regulation is equal to the benefit that might have accrued from alternate uses of the \$160 National Athletic Trainer Association membership fee over the period between initial licensure and renewal of license. Current regulation mandates that potential licensees attain all the training hours required for NATABOC credentialing before applying for athletic training licensure so there are no extra educational costs associated with the proposed regulation.

Individuals who intend to attain an athletic trainer license in the Commonwealth for just the initial 2+ year period but do not intend to renew their license¹ will have to pay an additional \$160 for National Athletic Trainer Association membership under the requirements of the proposed regulation

The board feels that current NATABOC certification is a good proxy for competence in the field of athletic training. Assuming this, the public is better served by regulations that require NATABOC credentials both for initial licensing and for license renewal. Given the small costs involved, this proposed regulatory change will likely provide a net benefit for the citizens of the Commonwealth.

Businesses and Entities Affected

The proposed regulatory change will affect individuals who apply for athletic trainer licensure after this regulation is promulgated. The board issued licenses to 149 individuals in 2004 and expects that between 100 and 150 individuals will be licensed this year.

¹ Only 1 person has ever sought athletic trainer licensure from the board without having current NATABOC credentials. The longer term career intentions of this individual are unknown.

Localities Particularly Affected

The proposed regulation will affect all localities in the Commonwealth.

Projected Impact on Employment

The proposed regulation will have little or no impact on employment in the Commonwealth.

Effects on the Use and Value of Private Property

To the extent that NATABOC credentials allow athletic trainers to demand a higher wage, their net worth will increase.

Small Businesses: Reporting, Recordkeeping, & Administrative Costs

Upon promulgation of the proposed regulation, individual athletic trainers will have to provide evidence of current NATABOC credentials when they initially apply for an athletic trainer license. If the application intake office does not allow use of their Xerox™ machine or if the application is mailed in, the applicant will have to pay \$0.15 (on average) to copy their proof of current certification.

Small Businesses: Alternative Method that Minimizes Adverse Impact

There are no alternate methods of reporting NATABOC certification status that are less costly.